

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

DARRYL ALBERT VARNUM,

Defendant

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CRIMINAL NO. 19 - 2251 JMC  
UNDER SEAL

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**MOTION TO SEAL CRIMINAL COMPLAINT  
AND SUPPORTING AFFIDAVIT**


The United States of America, by its undersigned attorneys, for the following reasons, moves this Honorable Court to order and direct that the Criminal Complaint and supporting Affidavit in the above-captioned case should be **SEALED**, and should not appear on the public docket or otherwise be known to the public at this time.

In support of this motion, the government submits that the criminal investigation is ongoing and that the target is not aware of the existence of the investigation. Any premature disclosure of the Criminal Complaint or the supporting affidavit could endanger federal agents and compromise the ongoing federal investigation.

WHEREFORE, the government respectfully requests that the Criminal Complaint and the affidavit in support of thereof, together with this motion and the Court's reasons for sealing, if made express in the order, be placed under seal until further of this Court.

Respectfully submitted,

Robert K. Hur  
United States Attorney

  
Kathleen O. Gavin  
Assistant United States Attorney

FILED \_\_\_\_\_ ENTERED \_\_\_\_\_  
LOGGED \_\_\_\_\_ RECEIVED \_\_\_\_\_

JUL 05 2019

AT BALTIMORE  
CLERK, U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
DEPUTY 